

EXHIBIT D

03/15/06 22:02 FAX

KIRKLAND & ELLIS LLP

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KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

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March 15, 2006

By First Class Mail & Facsimile

Michael E. Gordon
Wilmer Cutler Pickering Hale and Dorr LLP
2445 M Street, NW
Washington, DC 20037

Re: *Smith Kline & French Laboratories, LTD and SmithKline Beecham Corp., d/b/a GlaxoSmithKline v. Teva Pharmaceuticals USA, Inc., Civil Action No. 05-197 (GMS) (D. Del.)*

Dear Michael:

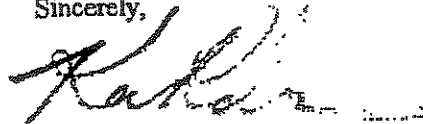
I write to schedule depositions for several individuals identified by GSK in your initial disclosures and interrogatory responses.

We have identified the following individuals for deposition in this case. Please let us know if they are current employees of GSK and, to the extent they are not, whether your firm represents them in this matter. We have provided proposed deposition dates but will cooperate with you to ensure to the extent possible that depositions are conducted taking into account the convenience of the witnesses and counsel with respect to date and location. Please confirm you will extend the same courtesies.

J. Paul Hieble	—	April 10, 2006
Carol Harvey	—	April 12, 2006
Roger J. Eden	—	April 14, 2006
William Huffman	—	April 18, 2006
Gregory Gallagher	—	April 24, 2006
Brenda Costall	—	April 27, 2006
David Owens	—	May 1, 2006

Please do not hesitate to contact me to discuss these depositions.

Sincerely,



Karen M. Robinson